

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors,

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LTD., WEST REALM  
SHIRES, INC., and WEST REALM SHIRES  
SERVICES, INC.,

Plaintiffs-Appellees,

-against

ROCKET INTERNET CAPITAL PARTNERS II  
SCS, ROCKET INTERNET CAPITAL  
PARTNERS (EURO) II SCS, GFC GLOBAL  
FOUNDERS CAPITAL GMBH, GFC GLOBAL  
FOUNDERS CAPITAL GMBH & CO.  
BETEILIGUNGS KG NR. 1, WILLIAM  
HOCKEY LIVING TRUST, and 9YARDS  
CAPITAL INVESTMENTS II LP,

Defendants-Appellants.

Adv. Pro No. 23-50379 (JTD)

Appeal from the United States Bankruptcy  
Court for the District of Delaware

ALAMEDA RESEARCH LTD., WEST REALM  
SHIRES, INC., and WEST REALM SHIRES  
SERVICES, INC.

Plaintiffs-Appellees,

-against-

MICHAEL GILES, *et al.*,

Defendants-Appellants.

Adv. Pro. No. 23-50380 (JTD)

Appeal from the United States Bankruptcy  
Court for the District of Delaware

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

**NOTICE OF APPEAL**

PLEASE TAKE NOTICE that the Defendants-Appellants listed in Annex A (the “Defendants-Appellants”), by and through their counsel, and, pursuant to 28 U.S.C. § 158(a)(3), Fed. R. Bankr. P. 8002, 8003(a), and 8004, and Local Rule 8003-1, hereby seek leave to appeal the Order [D.I. 289] (Exhibit A) and Memorandum Opinion [D.I. 288] (Exhibit B) entered by the U.S. Bankruptcy Court for the District of Delaware on October 23, 2024, to the extent they denied in part Defendants’ Motion to Dismiss the Complaint [D.I. 96].

The names of all parties to the order appealed from and the names, addresses, and telephone numbers of their respective attorneys are as follows:

**LANDIS RATH & COBB LLP**

Matthew B. McGuire (No. 3407)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, DE 19801  
Telephone: (302) 467-4400  
[landis@lrclaw.com](mailto:landis@lrclaw.com)  
[mcguire@lrclaw.com](mailto:mcguire@lrclaw.com)  
[brown@lrclaw.com](mailto:brown@lrclaw.com)  
[pierce@lrclaw.com](mailto:pierce@lrclaw.com)

-and-

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Sascha N. Rand (admitted *pro hac vice*)  
Katherine A. Lemire (admitted *pro hac vice*)  
51 Madison Ave, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100  
[sascharand@quinnemanuel.com](mailto:sascharand@quinnemanuel.com)  
[isaacnesser@quinnemanuel.com](mailto:isaacnesser@quinnemanuel.com)  
[andrewkutscher@quinnemanuel.com](mailto:andrewkutscher@quinnemanuel.com)

William Burck  
1300 I Street NW, Suite 900

**SAUL EWING LLP**

Lucian B. Murley (No. 4892)  
1201 N. Market Street, Suite 2300  
P.O. Box 1266  
Wilmington, DE 19899  
Telephone: (302) 421-6898  
[luke.murley@saul.com](mailto:luke.murley@saul.com)

-and-

**PALLAS PARTNERS (US) LLP**

Duane L. Loft (admitted *pro hac vice*)  
Joshua A. Naftalis (admitted *pro hac vice*)  
Anastasia Cembrowska (admitted *pro hac vice*)  
Jingxi Zhai (admitted *pro hac vice*)  
Adair Kleinpeter-Ross (admitted *pro hac vice*)  
75 Rockefeller Plaza  
New York, NY 10019  
Telephone: (212) 970-2300  
[joshua.naftalis@pallasllp.com](mailto:joshua.naftalis@pallasllp.com)  
[duane.loft@pallasllp.com](mailto:duane.loft@pallasllp.com)  
[anastasia.cembrowska@pallasllp.com](mailto:anastasia.cembrowska@pallasllp.com)  
[jingxi.zhai@pallasllp.com](mailto:jingxi.zhai@pallasllp.com)  
[adair.kleinpeter-ross@pallasllp.com](mailto:adair.kleinpeter-ross@pallasllp.com)

*Counsel to the Defendants Listed in Annex A*

Washington D.C. 20005  
Telephone: (202) 538-8000  
Facsimile: (202) 538-8100  
[williamburck@quinnemanuel.com](mailto:williamburck@quinnemanuel.com)

*Counsel for Plaintiffs Alameda Research Ltd.,  
West Realm Shires, Inc., and West Realm  
Shires Services, Inc. in Adv. Pro. No. 23-  
50379*

-and-

**SULLIVAN & CROMWELL LLP**

Steven L. Holley (admitted *pro hac vice*)  
Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Justin D. DeCamp (admitted *pro hac vice*)  
Christopher J. Dunne (admitted *pro hac vice*)  
Alexa J. Kranzley (admitted *pro hac vice*)  
125 Broad Street New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
[holleys@sullcrom.com](mailto:holleys@sullcrom.com)  
[dietdericha@sullcrom.com](mailto:dietdericha@sullcrom.com)  
[bromleyj@sullcrom.com](mailto:bromleyj@sullcrom.com)  
[gluecksteinb@sullcrom.com](mailto:gluecksteinb@sullcrom.com)  
[dunnec@sullcrom.com](mailto:dunnec@sullcrom.com)  
[decampj@sullcrom.com](mailto:decampj@sullcrom.com)  
[kranzleya@sullcrom.com](mailto:kranzleya@sullcrom.com)

*Counsel for Plaintiffs Alameda Research Ltd.,  
West Realm Shires, Inc., and West Realm  
Shires Services, Inc. in Adv. Pro. No. 23-  
50380*

**CROSS & SIMON, LLC**

Christopher P. Simon (No. 3697)  
1105 North Market Street, Suite 901  
Wilmington, DE 19801  
[csimon@crosslaw.com](mailto:csimon@crosslaw.com)

-and-

**HOGAN LOVELLS US LLP**

Dennis H. Tracey, III  
John D. Beck  
Maya Jumper 390 Madison Avenue  
New York, NY 10017  
Tel.: (212) 918-3000 Fax: (212) 918-3100  
[dennis.tracey@hoganlovells.com](mailto:dennis.tracey@hoganlovells.com)  
[john.beck@hoganlovells.com](mailto:john.beck@hoganlovells.com)  
[maya.jumper@hoganlovells.com](mailto:maya.jumper@hoganlovells.com)  
*Counsel for Defendants Rocket Internet  
Capital, Rocket Internet Capital Partners II  
SCS, Rucker Internet Capital Partners (Euro)  
II SCS, GFC Global Founders Capital  
GMBH, GFC Global Founders Capital  
GMBH & Co. Beteiligungs KG NR. 1*

**K&L GATES LLP**

Steven L. Caponi (No. 3484)  
Matthew B. Goeller (No. 6283)  
600 N. King St., Suite 901  
Wilmington, DE 19801  
Telephone: (302) 416-7000  
[steven.caponi@klgates.com](mailto:steven.caponi@klgates.com)  
[matthew.goeller@klgates.com](mailto:matthew.goeller@klgates.com)

*Counsel for Defendants Alumni Ventures  
Group Embedded Trust and Alumni Ventures  
Group – Embedded Financial Technologies  
Trust A*

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

Daniel A. Mason (No. 5206)  
Elizabeth Wang (No. 6620)  
1313 North Market Street, Suite 806  
P.O. Box 32  
Wilmington, DE 19899-0032

Telephone: (302) 655-4410  
Fax: (302) 397-2710  
[dmason@paulweiss.com](mailto:dmason@paulweiss.com)  
[ewang@paulweiss.com](mailto:ewang@paulweiss.com)

William A. Clareman (admitted *pro hac vice*)  
Gregory F. Laufer (admitted *pro hac vice*)  
Kenneth S. Ziman (admitted *pro hac vice*)  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Telephone: (212) 373-3000  
Fax: (212) 492-0248  
[wclareman@paulweiss.com](mailto:wclareman@paulweiss.com)  
[glauffer@paulweiss.com](mailto:glauffer@paulweiss.com)  
[kziman@paulweiss.com](mailto:kziman@paulweiss.com)

Randall S. Luskey (admitted *pro hac vice*)  
535 Mission Street, 24th Floor  
San Francisco, CA 94105  
Telephone: (628) 432-5100  
Fax: (202) 204-7391  
[rluskey@paulweiss.com](mailto:rluskey@paulweiss.com)

*Counsel for Embed Shareholder Defendants  
The 2016 Karkal Family Trust; Acrew  
Capital Fund (A), L.P.; Acrew Capital Fund,  
L.P.; Acrew Capital MGP, LLC; Bain Capital  
Venture Fund 2019 LP; BCIP Venture  
Associates II, L.P.; BCIP Venture Associates  
II-B, L.P.; BCV 2019- MD Primary, L.P.;  
Buckley Ventures GP, LLC; Buckley  
Ventures, LP; Correlation Ventures II, LP;  
Fin VC Regatta I, LP; Homebrew Ventures  
III, LP; Jonathan Christodoro; Kamran  
Ansari; Launchpad Capital Fund I LP; LGF  
II, L.P.; Liquid 2 Ventures Fund II, L.P.;  
Propel Venture Partners, LLC; Propel  
Venture Partners US Fund I LP; Putnam  
(Warren Lowell Putnam & Brynn Jinnett  
Putnam, Tenants in Common); Samuel Jones;  
Torch Capital II, LP; Transpose Platform  
o/b/o TI Platform Fund II; TI Platform NLI  
Venture Limited II; Transpose Platform  
Fintech Fund II, L.P.; TI Platform Fund II,  
LP; Treasury Fund I, LP; Y Combinator  
ES20, LLC; and YCC20, L.P.*

Dated: November 6, 2024  
Wilmington, Delaware

**SAUL EWING LLP**

/s/ Lucian Murley  
Lucian B. Murley (No. 4892)  
1201 N. Market Street, Suite 2300  
P.O. Box 1266  
Wilmington, DE 19899  
Telephone: (302) 421-6898  
luke.murley@saul.com

-and-

**PALLAS PARTNERS (US) LLP**

Joshua A. Naftalis (admitted *pro hac vice*)  
Duane L. Loft (admitted *pro hac vice*)  
Anastasia Cembrovskaya (admitted *pro hac vice*)  
Jingxi Zhai (admitted *pro hac vice*)  
Adair Kleinpeter-Ross (admitted *pro hac vice*)  
75 Rockefeller Plaza  
New York, NY 10019  
Telephone: (212) 970-2300  
joshua.naftalis@pallasllp.com  
duane.loft@pallasllp.com  
anastasia.cembrovskaya@pallasllp.com  
jingxi.zhai@pallasllp.com  
adair.kleinpeter-ross@pallasllp.com

*Counsel to the Defendants Listed in Annex A*

**ANNEX A**

9Yards Capital Investments II LP  
Aaron Frank  
AAVCF3 LP  
Adapt VC LLC  
Akhil Paul  
Benjamin Londergan  
Brandon Mann  
Brent Johnson  
Carol H. Duggan Revocable Living Trust  
Cathexis Subsidiaries GP, LLC  
Cathexis Ventures, LP  
Christian Nordby  
Christopher Harper  
Christopher Young  
Clayton Gardner  
David Meents  
Dena Wever  
Derek Clark  
EM Fund I, a series of Chris Golda Investments, LP Embedfi  
June 2021, a series of Party Round LLC  
Fairchild Fund III, LLC  
Fund I, a series of 20VC, LP  
Fund I, a series of Not Boring Capital, LP  
Harland Group LLC  
James Nichols  
Joe Percoco  
John Dwyer  
Jonathan Duarte  
Jonathan Weiner  
Joshua Allen Slate  
Justin Lovero  
Kerr Investment Holdings Pty Ltd a/t/f The Kerr Family  
Trust Kiara Baudoin  
Kick the Hive LLC  
KV5 Pty Ltd ATF KV5 Trust  
Matthew Lyon  
Michael Ferrari  
Michael Giles  
Monique Saugstad  
Motivate Ventures Fund I, LP

Motivate Ventures QP Fund I, LP  
Operator Partners, LLC  
Peter T. Lawler Living Trust  
Philippe Jabre  
PruVen Capital Partners Fund I, LP  
S20, a series of Chris Golda Investments, LP  
Silverstone Venture Investments Limited  
Soma Capital Fund, III, LP  
Soma Capital Fund III Partners LLC  
Stephen Harper  
Stuart Sopp  
SWS Holding Company, LLC  
The Gardner 2008 Living Trust  
Thomas G. Miglis Revocable Trust  
TriplePoint Private Venture Credit Inc.  
TriplePoint Venture Lending Fund, LLC  
TriplePoint Ventures 5 LLC  
VentureSouq Capital SPC o/b/o VSQ SP 59 (YCS20)  
William Hockey Living Trust  
Yaselleraph Finance Pty Ltd ATF Yaselleraph Finance  
Trust Z Perret Trust